



Ms. Susann D. Nachmann, Environmental Engineer  
US EPA Region 1 Office of Environmental Stewardship  
RCRA, EPCRA and Federal Programs Unit (OES05-1)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

July 16, 2013

Ms. Nachmann,

Thank you for your letter dated June 21, 2013 regarding EPA's compliance evaluation inspection conducted at our Londonderry, NH facility on September 16, 2011. In response, we would like to address each of the requirements set forth in your letter as follows;

**Requirement 1:**

**Properly mark and label containers of hazardous waste with the words "Hazardous Waste", words that describe the contents, federal/state waste codes, and beginning accumulation date in accordance with New Hampshire Env-Hw 507.03(a)(1)(a) through (d) and Env-Hw 508.02(d)(1)**

Prior to EPA's compliance evaluation inspection conducted at our Londonderry, NH facility on September 16, 2011 we were not aware that labels were required on buckets and drums in active use (i.e. not yet filled). We were instead mistakenly under the impression that labels were only required at the time buckets and drums were filled (i.e. date generated). This point was however clarified during the compliance evaluation inspection and corrective action was taken immediately. As such, all containers of hazardous waste, whether full or actively in use are marked with the words "Hazardous Waste", words that describe the contents, federal/state waste codes, and beginning accumulation date in accordance with New Hampshire Env-Hw 507.03(a)(1)(a) through (d) and Env-Hw 508.02(d)(1). Sample label enclosed.

**Requirement 2:**

**Contact the NHDES in order to update the Facility's hazardous waste generator notification information to properly reflect RMG's NAICS code, generator classification, and waste codes (with waste descriptions), in accordance with New Hampshire Env-Hw 504.02**

RMG Enterprise LLC  
113 Hillside Avenue, Londonderry, NH 03053  
Tel: 603-437-6945 • Fax: 603-437-6561  
Email: [info@rmgenterprise.com](mailto:info@rmgenterprise.com)  
[www.rmgenterprise.com](http://www.rmgenterprise.com)

RMG Enterprise registered with the NHDES Hazardous Waste Small Quantity Generator Self-Certification Program in November of 2011. At that time we submitted to NHDES a completed "Self-Certification and Declaration of Compliance Form" together with a completed "RCRA C Site Identification Form -Notification Form". The purpose of the "RCRA C Site Identification Form - Notification Form" was to update the facility's hazardous waste generator notification information to properly reflect RMG's NAICS code, generator classification, and waste codes (with waste descriptions), in accordance with New Hampshire Env-Hw 504.02. NHDES acknowledged receipt of this notification in writing on December 20, 2011 (enclosed).

If you have any questions, or if you require additional information, please contact me on my direct line at 603-235-5348.

With Best Regards,

A handwritten signature in black ink, appearing to read "Robert Gallinaro", written over a horizontal line.

Robert Gallinaro

Managing Partner, RMG Enterprise LLC

# **FILTER DUST**

GROSS WEIGHT

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TARE WEIGHT

---

NET WEIGHT

---

BEGINNING  
ACCUMULATION DATE

---

**HAZARDOUS WASTE, SOLID, N.O.S., D006/D008 (CADMIUM, LEAD)**

# **FILTER DUST**

GROSS WEIGHT

---

TARE WEIGHT

---

NET WEIGHT

---

BEGINNING  
ACCUMULATION DATE

---

**HAZARDOUS WASTE, SOLID, N.O.S., D006/D008 (CADMIUM, LEAD)**



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**

Thomas S. Burack, Commissioner



December 20, 2011

ROBERT GALLINARO  
RMG ENTERPRISE  
113 HILLSIDE AVE  
LONDONDERRY NH 03053

**RE: Subsequent Notification Form for EPA ID # NHD986473460**

Dear ROBERT :

This letter is to notify you that your company's subsequent notification form has been received and processed by the Waste Management Division for **113 HILLSIDE AVE, LONDONDERRY**. The above referenced EPA Identification Number is *site specific* and required to be used on all future hazardous waste manifests and reports.

This subsequent notification allows the Department of Environmental Services to process changes to your company's hazardous waste activity information. Both State and Federal data management systems have been updated accordingly. If you have any questions regarding the use of this EPA ID number, please contact me at (603) 271-2921.

Sincerely,

Jessica Spurling  
Data Control Clerk III  
Waste Management Division  
Reporting & Information Mgmt Section



From: (603) 437-6945  
Robert Gallinaro  
RMG Enterprise  
113 Hillside Avenue

Origin ID: BMLA



J13111302120326

Londonderry, NH 03053

Ship Date: 16JUL13  
ActWgt: 1.0 LB  
CAD: 100277972/INET3370

Delivery Address Bar Code

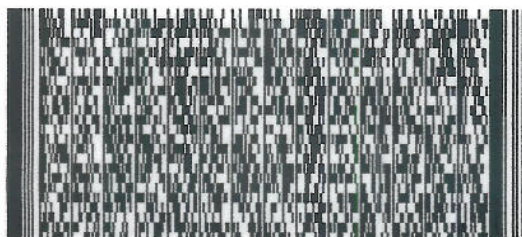


Ref # Documents  
Invoice #  
PO #  
Dept #

SHIP TO: (617) 918-1871

BILL SENDER

**Susann Nachmann**  
**US EPA, Region 1**  
**5 Post Office Square, Suite 100**  
**Office Env. Stewardship, MCOES05-01**  
**Boston, MA 02109**

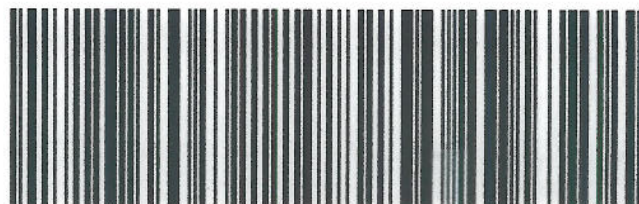


TRK# 7962 4277 7144  
0201

WED - 17 JUL 3:00P  
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**01 LWMA**

**02109**  
MA-US  
**BOS**



518G1/AA04/93AB

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2. Fold the printed page along the horizontal line.
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**United States Environmental Protection Agency**  
**Region I**  
**5 Post Office Square, Suite 100**  
**Boston, MA 02109-3912**

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

**JUN 21 2013**

Mr. Robert J. Gallinaro, President  
RMG Enterprise, Incorporated  
113 Hillside Avenue  
Londonderry, NH 03053

**Ré:** **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act ("RCRA"), the Hazardous and Solid Waste Amendments ("HSWA") of 1984, and the State of New Hampshire Department of Environmental Services, New Hampshire Code of Administrative Rules (Chapter Env-Hw 100 through 1114.04)

Dear Mr. Gallinaro:

On September 16, 2011, the United States Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection at RMG Enterprise, Inc., (RMG) in Londonderry, New Hampshire. The purpose of this inspection was to determine the compliance of RMG, EPA ID No. NHD986473460, with the State of New Hampshire Department of Environmental Services ("NHDES") Code of Administrative Rules (Chapter Env-Hw 100 through 1114.04) and Federal Hazardous Waste Management Regulations found at 40 CFR Part 260-272. The NHDES has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection, EPA has determined that your facility violated certain provisions of the Department of Environmental Services Rules and the RCRA regulations, promulgated at 40 CFR Part 260 through Part 272. The specific violations are set forth below:

**1. Failure to clearly mark and label containers where hazardous waste is stored with the words "Hazardous Waste," words that describe the contents, federal/state waste codes and beginning accumulation date in accordance with New Hampshire Env-Hw 507.03(a)(1)(a) through (d), and Env-Hw 508.02(d)(1) and(2):**

- a. EPA observed 2 orange 5-gallon closed buckets labeled "Universal Waste, Lamps, D009," however, according to Mr. Gallinaro, these containers were used to store broken fluorescent lamps. Since these lamps were no longer intact, the contents of the buckets corresponded to mercury-bearing hazardous waste. At the time of the inspection, Mr. Gallinaro changed the labeling on the buckets to "Hazardous Waste, D009" however, he did not know the accumulation start date; and



- b. EPA observed unlabelled drums associated with the CRT crushing area dust collector. Specifically, the two 55-gallon drums that were still in-line with the dust collector and were actively collecting dust. These drums were not labeled with the words "hazardous waste" or with words that describe their content.

**2. Failure to properly notify with the NHDES prior to conducting any hazardous waste activities covered under the hazardous waste rules in accordance with New Hampshire Env-Hw 504.02:**

Per 4/13/03 notification in RCRAInfo, RMG generates spent non-halogenated solvents, F003 and F005. However, these were the wastes generated by the former owner/operator of the Facility, namely New England Tanya Finishes (a jewelry and silverware manufacturer). The actual wastes generated by RMG are lead and cadmium-bearing particulate waste from the dust collection system associated with the CRT crushing machine.

RMG had notified the NHDES to update the facility name change, owner name change, and owner address change, and these updates were reflected in the federal and state database at the time of the inspection. However, the following information was not updated with the state and, consequently, RCRAInfo still reflects information specific to the former tenant: the RMG-specific NAICS code, generator classification, and waste codes (with waste descriptions).

**RMG is hereby required to:**

**Immediately upon receipt of this NOTICE:**

1. Properly mark and label containers of hazardous waste with the words "Hazardous Waste," words that describe the contents, federal/state waste codes and beginning accumulation date in accordance with New Hampshire Env-Hw 507.03(a)(1)(a) through (d) and Env-Hw 508.02(d)(1); and
2. Contact the NHDES in order to update the Facility's hazardous waste generator notification information to properly reflect the RMG's NAICS code, generator classification, and waste codes (with waste descriptions), in accordance with New Hampshire Env-Hw 504.02

RMG must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.

**Within thirty (30) days of receipt of this NOTICE:**

RMG is hereby required to submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violations to:

1. Properly mark and label containers of hazardous waste with the words "Hazardous Waste," words that describe the contents, federal/state waste codes and beginning accumulation date in accordance with New Hampshire Env-Hw 507.03(a)(1)(a) through (d) and Env-Hw 508.02(d)(1); and

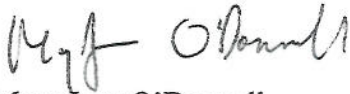
2. Contact the NHDES in order to update the Facility's hazardous waste generator notification information to properly reflect the RMG's NAICS code, generator classification, and waste codes (with waste descriptions), in accordance with New Hampshire Env-Hw 504.02.

Information submitted in accordance with this NOTICE should be sent to the following address:

Ms. Susann D. Nachmann, Environmental Engineer  
US EPA Region 1 Office of Environmental Stewardship  
RCRA, EPCRA and Federal Programs Unit (OES05-1)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

Failure to correct the violations, as required by this NOTICE may subject RMG Enterprise, Inc. to further Federal enforcement action, including an assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 692. If you have any questions regarding this NOTICE, please contact Susann D. Nachmann or my staff at (617) 918-1871.

Sincerely,



Mary Jane O'Donnell

Acting Manager, USEPA, OES, RCRA, EPCRA and Federal Programs Unit

cc: Todd Leedberg, NHDES Hazardous Waste Compliance Section Supervisor  
John Duclos, NHDES Hazardous Waste Management Bureau Administrator  
Susann D. Nachmann, EPA  
RCRA file



7011 2970 0004 0273 1921

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To: Mr. Robert J. Gallinaro, President  
RMG Enterprise, Incorporated  
113 Hillsdale Avenue  
Londonderry, NH 03053

PS Form 3800, August 2006 See Reverse for instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece.

1. Mr. Robert J. Gallinaro, President  
RMG Enterprise, Incorporated  
113 Hillsdale Avenue  
Londonderry, NH 03053

2. Article Number  
(Transfer from service label)

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
X *Dan Mansberry* ☐ Agent ☐ Addressee

B. Received by (Printed Name)  
DAN MANSBERRY

C. Date of Delivery  
6/24/13

delivery address different from item 1? ☐ Yes  
YES, enter delivery address below: ☐ No

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

7011 2970 0004 0273 1921

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



**United States Environmental Protection Agency**  
**Region 1**

**RCRA Inspection Report**

**Date:** January 7, 2013 (Final)

**From:** Susann D. Nachmann, Environmental Engineer  
RCRA, EPCRA and Federal Facilities Programs Unit

**Through:** Lisa Papetti, Senior Enforcement Coordinator  
RCRA, EPCRA and Federal Facilities Programs Unit

**To:** File

**Subject:** Environmental Protection Agency Region I (EPA)  
Resource Conservation and Recovery Act (RCRA) Inspection Report for  
RMG Enterprises, Incorporated

## RCRA HAZARDOUS WASTE INSPECTION REPORT

Facility Name: RMG Enterprise, Incorporated ("RMG" or "Facilty")  
Type of Inspection: Compliance Evaluation Inspection (CEI)  
Name of Inspectors: Susann D. Nachmann, Environmental Engineer  
Andrew Meyer, Environmental Scientist, EPA Region I  
Date of Inspection: September 16, 2011

### **A. BACKGROUND INFORMATION**

EPA Identification Number: NHD986473460  
NAICS Code: (See comment below)  
Facility Name: RMG Enterprise, Inc. ("RMG" or the "Facility")  
Complete Street Address: 113 Hillside Ave.  
(same mailing address) Londonderry, NH 03053  
Telephone Number: 603-437-6949  
Facsimile Number: 603-437-6561

Contact Names, Titles: Robert Gallinaro, President  
[bobg@rmgenterprise.com](mailto:bobg@rmgenterprise.com)  
website address: [www.rmgenterprise.com](http://www.rmgenterprise.com)

Date Established at present location:  
Based on notification in RCRAinfo: April 14, 2003

Current Property Owner: Robert Gallinaro, President/Owner  
86 Cox Street  
Nashua, NH 03064

#### Current/Actual Notification in RCRAinfo (circle/check all that apply)

<u>[FED]</u>	→	CT	MA	ME	NH	RI	VT
<u>[LQG]</u>	→	LQG	LQG	LQG	FQG1	LQG	LQG
<u>[SQG]</u>	→	SQG	SQG	SGQ+	FQG2	SQG	SQG
<u>[CESQG]</u>	→	CESQG	CESQG	SQG	<u>SQG</u>	CESQG	CESQG

[Per 4/13/03 notification in RCRAinfo: RMG generates spent non-halogenated solvents, F003 and F005. However, these were the wastes generated by the former owner/operator of the Facility, namely New England Tanya Finishes (a jewelry and silverware manufacturer). The actual wastes generated by RMG are lead and cadmium-bearing particulate waste from the dust collection system associated with the CRT crushing machine. EPA inspectors informed Mr. Gallinaro that he should contact the NHDES to accurately update his Facility's information on the notification and in RCRAinfo. Mr. Gallinaro indicated that he would contact NHDES immediately.]

☐ TSDF  
☒ Universal Waste Handler (circle one): SMALL / LARGE (i.e. fluorescent lamps)  
☐ Burner/Blender  
☐ Transporter



- \_ Receiving waste from off-site (If so, describe):
- \_ Generator of State Waste
- \_ Other:

**Inspection and Permitting History:**

RMG has not been inspected by either EPA or the New Hampshire Department of Environmental Services (NHDES) for compliance with RCRA prior to this inspection.

However, NHDES has issued RMG a permit as a solid waste management facility. This permit was issued on April 25, 2003. (See permit number DES-SW-SP-03-003 provided Attachment 2). Permit Condition 6 authorizes the facility to receive and process computers, networking equipment, computer monitors, televisions, printers, keyboards, mice, adapters, stereos, speakers, VCRs, scanners, fax machines, copiers, telephones and telephone systems, computer wire and cable computer devices and storage devices power supplies circuit boards scrap aluminum scrap copper uninterrupted power surge batteries, laptop batteries and related computer and electronic equipment. This corresponds well with the material discussed at the facility's website and observed during the tour.

Permit Conditions 7 also prohibits the acceptance of the following materials: hazardous wastes, sludge or spetage waste, liquid wastes, asbestos wastes, "contained" gaseous wastes, infectious waste, ash, contaminated soils, explosives, and other wastes not authorized in permit condition 6. (Note: The EPA inspection team did not observe any of the above listed prohibited wastes during the September 16, 2011 inspection.)

Inspector Nachmann, as the Region I RCRA Hazardous Waste Import/Export Coordinator, had become aware that RMG received hundreds of cathode ray tubes (CRTs) that had been previously exported by a Massachusetts company to Indonesia, and subsequently rejected and returned to the United States.

Specifically, RMG enterprises had been contacted by Cathode Ray Tube Recycling (CRTr) of Brockton, Massachusetts to accept and process the rejected CRTs. These CRTs were sent to RMG after nine sea containers, packed by CRTr and destined to Indonesia, were rejected by the Indonesian government and sent back to the United States. CRTr of Brockton contracted with RMG to domestically handle and dispose of the CRTs. EPA conducted this inspection to review the CRT handling and processing operations at RMG in order to understand how the Indonesian-rejected CRTs were processed.

**B. IN-BRIEF**

Credentials Presented:      Yes

Attendees (names/titles):

Robert Gallinaro, President, RMG

Susann D. Nachmann, Environmental Engineer, EPA Region I

Andrew Meyer, Environmental Scientist, EPA Region I



Records Requested for Review:

1. All available manifests and associated LDR notices for calendar years 2008 through 2011;
2. MSDS (upon request, if identified during the Facility Tour); and
3. A copy of the Facility's layout, which was reviewed during the inspection in-brief. The layout is provided as Attachment 1.

Facility Description:

[The following information is from the facility's website as confirmed during the EPA CEI inspection.] RMG enterprise is a one-stop resource for remarketing and recycling excess and obsolete electronic equipment including (but not limited to) cathode ray tubes, computer monitors, radios, microwaves, keyboards and computer mice, refrigerators, stereo systems, speakers, microscopes, networking gear such as hubs, switches and routers, media such as DVDs, VHS tapes and computer disks, flat screen TVs, printers, hard drives, and other electronic equipment. Other services provided by RMG include on-site pickup of electronic waste primarily focusing in Rhode Island, Connecticut and Massachusetts, remarketing of reusable assets, recycling of dismantled materials, and leasing of storage pods to municipalities for the collection of above materials. According to the facility's website, RMG services are extended to municipalities, as well as commercial and not-for-profit operations.

RMG focuses primarily on the recycling or reuse of the above materials. According to Mr. Gallinaro, greater than 80% of his business corresponds to the dismantling of cathode ray tubes. The remaining 20% of his business corresponds to the dismantling of computer and IT equipment. He indicated that RMG's CRT recycling facility is capable of processing up to 1,000,000 pounds of CRT-bearing equipment per shift per month. Mr. Gallinaro indicated that, upon completion of processing, he sends documentation to customers, including a certificate of recycling or reuse, to certify that all equipment received at the facility has been properly managed and recycled. Also, as seen in Attachment 3, RMG has submitted a notice of intent to export cathode ray tubes for reuse in accordance with EPA's cathode ray tube rule.

RMG also provides a shredding service that destroys hard drives, tapes, CD-ROMs, flash drives, optical disks, zip disks and tapes to ensure that secure data cannot be recovered. RMG also provides nondestructive data erasure, which involves overwriting of hard disk drives, removal of client asset tags and identifying marks, inspection of all equipment for any other forms of proprietary data. Upon completion of such processing, a verification of data erasure is sent by e-mail to the customer. Some equipment may be subsequently resold and other equipment that is not suitable for resale after data erasure is dismantled to harvest potentially sellable components. Once dismantled, the residual equipment and materials are recycled.

Other In-brief findings:

- Facility was incorporated in 2001 and was formerly located at 28 Charron Avenue, Nashua, NH. As of ~April 2003, the Facility was re-located to this current address;



- The prior tenant of the facility was NE Tanya Finishes that manufactured jewelry;
- According to Mr. Gallinaro, RMG recently became "R2" and "e-Steward" (industry standard) certified. These certifications set standards for the industry regarding how materials are recycled, reclaimed, and sent after processing. Both certifications were received on August 19, 2011. Robert Gallinaro (President) and Kevin Barry (Office Manager) were the facility representatives involved in applying for and subsequently complying with R2 and e-Steward certifications;
- The Facility operates one shift, 7:30 a.m. through 5 p.m.;
- The Facility employs approximately 25 individuals;
- All exterior building maintenance is conducted by the landlord;
- Basic interior maintenance is conducted by RMG employees. Only latex paints are used (and, according to Mr. Gallinaro, used to completion) if painting is conducted by RMG staff. More extensive interior repairs and maintenance are contracted out.
- RMG's fleet consists of one tractor, one box truck and two propane forklifts the leased from Penske;
- The Facility does not operate a maintenance shop, degreaser or parts washer;
- The facility's main building, not including office space, is 38,000sq.ft. This was recently expanded from the original 20,000 sq. ft. in May 2011;
- The Facility recently underwent a phase 2 environmental audit conducted by a private company. The audit was requested by a new investor. According to Mr. Gallinaro, the audit did not highlight significant concerns or violations. Mr. Gallinaro indicated that he could make the audit available to EPA electronically upon request;
- Mr. Gallinaro indicated that he has been under contract with Rhode Island municipalities for approximately 3 years and that he has recently contracted with municipalities from Connecticut and Massachusetts. RMG's primary customer base consists of these municipalities and their collected electronic wastes that are ultimately shipped to RMG for processing/recycling and or reuse. RMG was approved for use as an electronic recycler in the state of Maine. However, Mr. Gallinaro indicated that he did not want to spread his operation "too thin". Further, he did not pursue business in Maine in 2010/2011 because of the time constraints imposed by the R2 and e-Steward certifications. Mr. Gallinaro indicated that he would eventually expand his business into the state of Maine;
- RMG often uses its own fleet and personnel to package, palletized and wrap equipment at a customer's site for subsequent delivery to its facility for processing. According to Mr. Gallinaro, some materials are brought to RMG in large storage pods that are filled during municipality household hazardous waste collection days. RMG's leases these large storage pods to municipalities and then pick up the pods for delivery to the facility for processing;
- Mr. Gallinaro indicated that RMG storage containers leased to municipalities are primarily used for the collection of household hazardous waste electronics. As far as Mr. Gallinaro knows these municipalities do not allow for the collection of electronic wastes from generators or businesses;
- EPA Inspector Nachmann asked if RMG generated any hazardous wastes, Mr. Gallinaro indicated that RMG does generate a hazardous waste stream from the dust collection system associated with the CRT glass crushing line. Mr. Gallinaro



stated that he recently shipped some hazardous waste out on a uniform hazardous waste manifest corresponding to cadmium and lead-bearing dust originating from the glass crushing machine dust collection system (see Attachment 4); and

- EPA Inspectors explained to Mr. Gallinaro that the current EPA ID notification form is still specific to the former tenant/owner located at 113 Hillside Avenue. Specifically, the Facility is still notified under North American industrial classification code 33991, which corresponds to jewelry and silverware manufacturing. Furthermore, the notification form indicates that RMG enterprise generates F listed wastes at F003 and F005, which are wastes affiliated with former tenants. Additionally, the notification gives no indication of RMG enterprises actual hazardous waste generation (i.e. dust collector wastes bearing hazardous levels of cadmium and lead (see Attachment 4)).

### **C. FACILITY TOUR (the entire Facility depicted in Attachment 1 was inspected:**

#### **Sorting Area:**

EPA inspectors proceeded to the sorting area where all incoming wastes are manually sorted into different categories of wastes. The following waste streams were observed in the sorting area: toner, media such as DVDs and VHS, speakers, stereo components, networking gear such as hubs and switch routers, plastic components, computer keyboards, CRTs, microscopes, speakers, microwave ovens, flat screen monitors, and printers. All of the observed components corresponded well the allowable wastes covered under the solid waste permit contained in Attachment 2.

According to Mr. Gallinaro, personal computer/information technology (PC/IT) equipment dismantling/segregation/recycling corresponds to ~20% of the business, while ~80% of the work deals with the dismantling/segregation/recycling of CRTs.

#### **CRT Dismantling Area:**

CRT dismantling occurs in a separate area adjacent to the sorting area. CRTs are lined up on a bench and dismantled into separate components such as circuit boards, plastic cabinetry, copper wiring and cones, screws, scrap metal, wood and plastic consoles, and CRT vacuum tubes. Once CRT-bearing equipment is dismantled the CRT vacuum tubes are placed onto a conveyor belt that gradually feeds the CRTs into a large mechanical crushing unit ("Breaker/Crushing Unit"). The crushing unit is operated under negative pressure to prevent the release of hazardous dust and particulate glass pieces (e.g. containing TCLP lead, cadmium, barium). Dust that is generated during the crushing operation is captured by a dust collection system (i.e. Gold Series Farr Dust Collector with 16 air purifying filters and two in-line 55-gallon drums to collect dust/residue). Waste from the dust collection system is sent off-site as lead and cadmium-bearing hazardous waste. At the time of the inspection, the 55-gallon drums were still in-line with the dust collector and were actively collecting lead and cadmium-bearing dust. However, these satellite area accumulation drums were not labeled with the words "hazardous waste" or with words that describe their content. Mr. Gallinaro indicated that the drums would be shipped directly from the Dust Collector when they become full. The resultant pieces of broken CRT are fed to RMG staff via conveyor belt from which they manually



pull off pieces of unleaded panel glass. Non-hazardous, segregated panel glass (i.e. below TCLP for RCRA metals) is sent to a glass recycler, whereas the rest of the crushed TCLP (i.e. leaded) panel glass is sent to a lead smelter in Canada for a lead reclamation. Glass that spills to shelving, surfaces and the adjacent floor in the CRT processing area is regularly swept up into "spill kits" which are eventually emptied into the crusher machine.

[Note: According to Mr. Gallinaro the large copper wire wound cones contained within the CRT vacuum tubes correspond to one of the largest cash incomes for RMG. He further indicated that anything that contains copper or precious metal is dismantled in-house, and all printed circuit boards collected during processing is sent to Colt Refining for recycling.]

**Bailer Machine:** This machine is used to bundle plastic pieces, shards and scrap generated from the dismantling of materials processed at the Facility. No metal fragments were observed in the pieces of plastic heading toward the bailer or in the finished bales of plastic observed in storage awaiting exportation to a plastics recycler. All bailed plastic is exported for recycling.

**Freon Draining Area:** Inspectors next observed several refrigerator units and air conditioning (AC) units waiting to be processed at the Facility. RMG only accumulates these units and then contracts with an outside vendor to pump out and remove any freon/refrigerants from the units. After freon/refrigerants are drained from the units, the units are sent off-site (intact) to a third party(s) vendor for refurbishing/reuse or dismantling/recycling.

**Liquid Crystal Display (LCD) Panel Storage Area:** According to Mr. Gallinaro, since LCD panels are "current" technology, RMG has the ability to resell LCD panels and circuit boards. The panels observed in storage were awaiting shipment to client and prospective clients for refurbishing and re-use.

**Universal Waste Storage:** EPA observed two orange 5-gallon closed buckets labeled "Universal Waste, Lamps, D009," however, Mr. Gallinaro explained that these containers held broken fluorescent lamps. Inspectors explained that since the lamps were no longer intact, the contents of the buckets most likely corresponded to mercury-bearing hazardous waste. Mr. Gallinaro changed the labeling on the buckets to "Hazardous Waste, D009," however, he did not know the accumulation start date.

**Hazardous Waste Manifest Review:** No issues were found during EPA's review of the available documents. Manifests were complete, timely, accurate and consistent with in-brief information, and EPA observations made during the Facility Tour.

## **C. OUT-BRIEF**

### **Attendees (names/titles):**

Susann D. Nachmann, Environmental Engineer, EPA Region 1



Andrew Meyer, Environmental Scientist, EPA Region 1  
 Robert Gallinaro, President, RMG

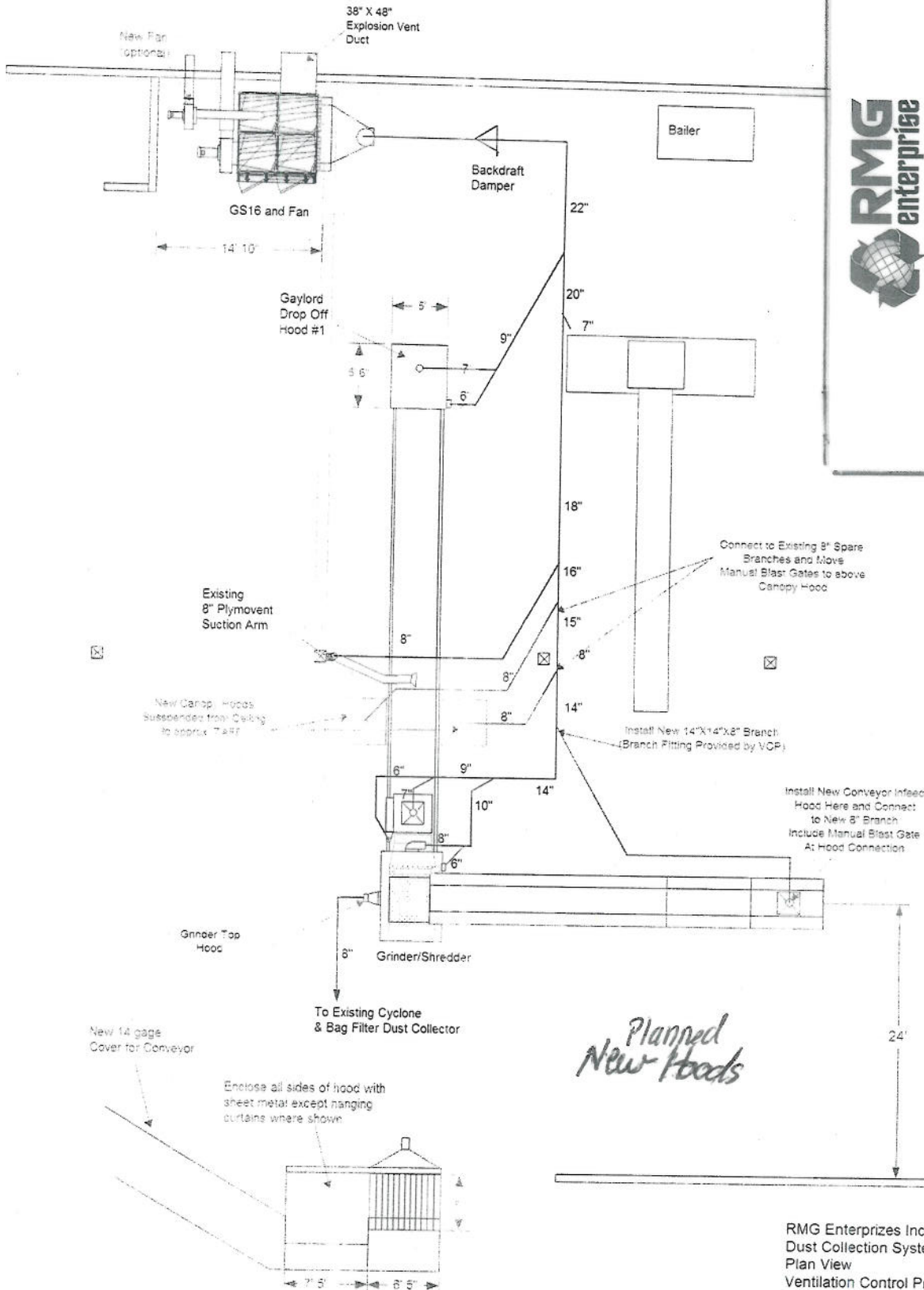
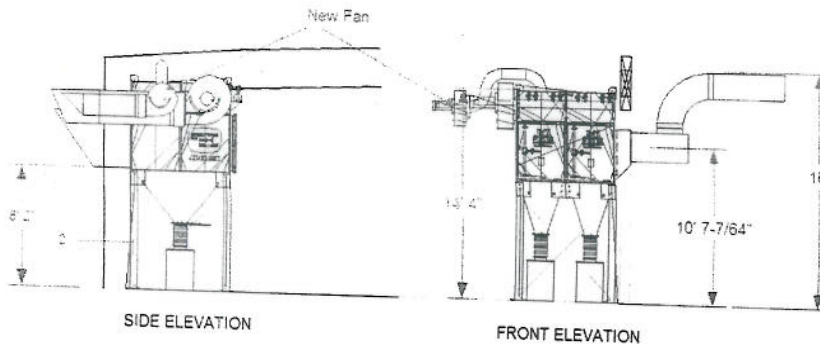
Summary of Findings	Description
Incomplete generator notification	When the RMG moved to this current location, Mr. Gallinaro evidently notified the state about the facility name change, owner name change, and owner address change. These changes were implemented in both state and federal data bases. However, the following information was not updated with the state and, consequently, RCRAinfo still reflects information specific to the former tenant: NAICS code, generator classification, and waste codes (with waste descriptions). This information must be updated with the state and in RCRAinfo. Mr. Gallinaro indicated that he would work with the NHDES to correct these omissions.
Unlabelled Satellite Accumulation Area (SAA) drums associated with the CRT crushing area dust collector.	The two 55-gallon drums were still in-line with the dust collector and were actively collecting dust. However, these SAA drums were not labeled with the words "hazardous waste" or with words that describe their content.
Mislabeled and undated hazardous waste buckets	EPA observed 2 orange 5-gallon closed buckets labeled "Universal Waste, Lamps, D009," however, these containers held broken fluorescent lamps. Inspectors explained that since the lamps were no longer intact, the contents of the buckets most likely corresponded to mercury-bearing hazardous waste. Mr. Gallinaro changed the labeling on the buckets to "Hazardous Waste, D009" however, he did not know the accumulation start date.

**List of Attachments:**

- Attachment 1: Facility Diagram with Yellow Highlights Indicating location of Future Additional Particle Capture Hoods;
- Attachment 2: Solid Waste Management Facilities Standard Permit, Dated April 25, 2003.
- Attachment 3: RMG Enterprise Notice of Intent To Export Used Cathode Ray Tube (CRT) Glass for Recycle, Dated October 22, 2008;
- Attachment 4: Uniform Hazardous Waste Manifest Number 00877049JJJ Dated July 12, 2011;
- Attachment 5: RMG Enterprise Webpage Information; and
- Attachment 6: RCRA handler information report for ID number NHD986473460, and for ID number NHD510098338.

[Note: No photographs were taken by EPA during this inspection.]

*Enforcement Sensitive Information  
 (NOT included in  
 Response)*



**Robert Gallinaro**  
PRESIDENT

Tel: 603-437-6945  
Fax: 603-437-6561  
Cell: 603-235-5348

113 Hillside Avenue  
Londonderry, NH 03053  
bobg@rmgenterprise.com  
www.rmgenterprise.com

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State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**  
 6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
 (603) 271-2900 FAX (603) 271-2456



April 25, 2003

Mr. Robert J. Gallinaro, President  
 RMG Enterprise, Inc.  
 109-113 Hillside Avenue  
 Londonderry, NH 03053

**Subject: Standard Permit No. DES-SW-SP-03-003, for RMG Enterprise, Inc., Located at 109-113 Hillside Avenue, Londonderry, New Hampshire**

Dear Mr. Gallinaro:

Enclosed herewith is Standard Permit No. DES-SW-SP-03-003 that authorizes RMG Enterprise, Inc. to process solid waste materials at the above noted location. This permit is issued by the New Hampshire Department of Environmental Services, Waste Management Division (Department) pursuant to the provisions of RSA 149-M:9 and Part Env-Wm 314 of the New Hampshire Solid Waste Rules (Rules).

Please carefully review all terms and conditions of the permit, including all regulations that may be cited therein. If there are any questions concerning any requirement, please contact this office for clarification. It is important from the onset of operating the facility that you clearly understand all requirements.

Please maintain a copy of this permit with your facility file records for future reference and conspicuously post a copy of the permit at the facility. In addition, you should have available a full copy of the Rules for reference in correctly administering the provisions of your permit. Copies of the Rules are available from the Public Information & Permitting Office at (603) 271-2975 and on the Department's website at [www.des.state.nh.us](http://www.des.state.nh.us).

Please further note that from time to time the Department will conduct inspections of the facility pursuant to the provisions of Env-Wm 3700.

If you have any questions regarding the issuance of this permit, please call me at (603) 271-5185. Questions regarding operational compliance may be directed to the district inspector for your region of the state, Doug Kemp, who may be contacted in the Department's Solid Waste Management Bureau at (603) 271-2925. In addition, should you require assistance specifically

Mr. Robert J. Gallinaro  
RMG Enterprise, Inc.  
April 25, 2003  
Page 2 of 2

related to recycling activities at this facility, you may contact the Department's recycling coordinator, Marc Morgan, at (603) 271-3712.

Sincerely,



Wayne A. Wheeler, P.E.  
Permitting & Design Review Section  
Solid Waste Management Bureau

Enclosure: Permit No. DES-SW-SP-03-003

cc: Londonderry Town Council  
Town Clerk's Office  
Richard S. Reed/Michael E. Guilfoy/Doug Kemp/SWMB files  
PIP





## SOLID WASTE MANAGEMENT FACILITY STANDARD PERMIT

as authorized by the  
NH Department of Environmental Services, Waste Management Division (Department)  
pursuant to RSA 149-M and Part Env-Wm 314 of the New Hampshire Solid Waste Rules (Rules)

**I. PERMIT/FACILITY IDENTIFICATION:**

Permit No.: DES-SW-SP-03-003  
Permittee: RMG Enterprise, Inc.  
Facility Name: RMG Enterprise, Inc.  
Facility Location: 109-113 Hillside Avenue, Londonderry, NH  
Facility Type: Processing/Treatment  
Service Type: Commercial

**II. FILE REFERENCE/RECORD OF APPLICATION:**

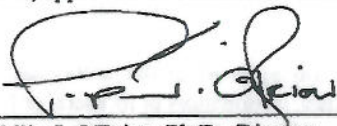
Date(s) Received: February 5, 2003  
WMD Log #(s): 200300036

**III. TERMS AND CONDITIONS:** The permittee shall comply with the requirements of RSA 149-M, the Rules, and the attached terms and conditions, as amended.

**IV. AUTHORIZATION:** Pursuant to RSA Chapter 149-M and Part 314 of the Rules, this permit is hereby issued to the permittee as identified in Section I above to operate the solid waste management facility identified in Section I above, subject to the terms and conditions in Section III above. This authorization is based on information and representations provided to the Department by the permittee, in documents referenced in Section II above. If the information is false, misleading or incomplete, the permit may be revoked or suspended in accordance with Section Env-Wm 306 of the Rules.

**BY EXERCISING ANY RIGHTS UNDER THIS PERMIT, THE PERMITTEE HAS AGREED TO ALL TERMS AND CONDITIONS OF THE PERMIT.** Failure to comply with these terms and conditions could result in civil or criminal penalties, suspension or revocation of the permit. No liability is incurred by the State of New Hampshire by reason of any approval of this solid waste facility. Approval by the Department is based on plans and specifications supplied by the permittee. No warranty/guarantee is intended or implied by reason of any advice given by the Department or its staff.

This permit shall not eliminate the permittee's obligation to obtain all requisite federal, state or local permits, licenses or approvals, or to comply with all other applicable federal, state, district and local permits, ordinances, laws, approvals or conditions relating to the facility.

  
Philip J. O'Brien, Ph.D., Director  
Waste Management Division

April 25, 2003  
Date

## TERMS AND CONDITIONS

- (1) **Basis of Approval/Supporting Documentation:** This facility is permitted on the basis of information provided by the permittee in permit application documents identified as follows:

Standard permit application documents (ref: WMD Log #200300036; received February 5, 2003)

- (2) **Citation and Definitions:** This permit has been prepared on the basis of the New Hampshire Solid Waste Rules, Env-Wm 100-300 & 2100-3700, as amended and readopted on August 12, 2000. Accordingly, the meaning of specific terms in this permit conform to definitions set forth in Env-Wm 102 of the New Hampshire Solid Waste Rules, hereafter referred to as the Rules.

- (3) **Regulatory Requirements:** This facility shall comply with the requirements of RSA 149-M, the Rules, as may be amended from time to time, and the terms and conditions of this permit. Further, the development and operation of this facility is expected to conform to the proposal submitted in the permit application documents cited by condition (1) of this permit. Where conflicts may exist between the proposal represented in the permit application and the terms and conditions of this permit, the terms and conditions of this permit shall apply.

- (4) **Facility Type:** This facility shall serve as a processing/treatment facility, in accordance with the provisions of Env-Wm 2200 of the Rules, for solid waste as specified in conditions (5) & (6) below.

- (5) **Service Type and Area:** This facility is a commercial facility, as defined by Env-Wm 102.37. The facility will receive wastes from the private and industrial sectors.

- \* (6) **Authorized Wastes:** This facility is authorized to accept computers (personal computers, mainframes, mid-range computers, laptops); networking equipment (hubs, switches, control cards, etc.); computer monitors; televisions; printers; keyboards; mice; adaptors; stereos; speakers; VCRs; scanners; fax machines; copiers; telephones and telephone systems; computer wire and cable; computer drives and storage devices (floppy drives, CD ROMs, hard drives, tape drives, etc.); power supplies; circuit boards; scrap aluminum; (machines and machine parts, cable extrusions, cast, etc.); scrap copper (cable, pipe, etc.); UPS (uninterrupted power surge) batteries; laptop batteries; and related computer and electronic equipment.

- (7) **Prohibited Wastes:** This permit does not authorize the facility to accept:

- (a) Hazardous waste;
- (b) Sludge or septage waste;
- (c) Liquid wastes;
- (d) Asbestos waste;
- (e) Contained gaseous waste;
- (f) Infectious waste;
- (g) Ash;
- (h) Contaminated soils;
- (i) Explosives; and
- (j) Other wastes not authorized per condition (6) above to include wastes for which the facility has not been designed; or which may be detrimental or hazardous to the facility, its operators or its users; or for which the facility has no provisions for removal to a permitted facility or marketplace for reuse.

- (8) **Facility Capacity:** This facility's approved design capacity, as defined by Env-Wm 102.09(a), shall be that quantity of authorized wastes that can be handled by the facility within the terms of this permit, in a safe and environmentally protective manner, and shall not exceed 10 tons per day of unprocessed waste. The maximum quantity of unprocessed waste stored at the facility shall not exceed 60 tons. The maximum quantity of processed waste stored at the facility shall not exceed 120 tons.



- (9) **Operating Requirements:** This facility shall operate in compliance with the following requirements, as in effect on the issue date of this permit and as may be amended subsequent to the issue date of this permit:
- (a) RSA 149-M;
  - (b) The New Hampshire Solid Waste Rules (ref. Env-Wm 100-300 & 2100-3700), specifically including Env-Wm 2205, 2705 and 2805;
  - (c) All terms and conditions of this permit;
  - (d) The Operating Plan found in Section 7 of the permit application documents cited in condition (1) of this permit, except as may be amended by the terms and conditions of this permit; and
  - (e) The terms of any authorization to operate granted by the Department pursuant to the provisions of Env-Wm 2805.03.
- (10) **Public Benefit:** It is the determination of the Department under RSA 149-M:11 that this facility can provide a substantial public benefit if the facility operations conform to the following conditions:
- (a) The total tons of waste transferred to a New Hampshire landfill or incinerator shall not exceed the number of tons received from New Hampshire generators;
  - (b) During each calendar year that the facility receives waste, facility operations shall involve practices which cause or support efforts to separate and divert recyclable materials to places authorized by local, state, or federal regulations to receive the materials for reuse and avoid disposal of such materials in a lined landfill with a leachate collection system; and
  - (c) During each calendar year that the facility receives waste, the permittee shall communicate with the solid waste district in which it is located as specified in Env-Wm 2805.12.
- (11) **Closure Requirements:** Closure of this facility shall comply with the following requirements, as in effect on the issue date of this permit and as may be amended subsequent to the issue date of the permit:
- (a) RSA 149-M;
  - (b) The New Hampshire Solid Waste Rules (ref. Env-Wm 100-300 & 2100-3700), specifically including Env-Wm 2206, 2706, and 2806;
  - (c) All conditions of this permit; and
  - (d) The provisions of the facility's Closure Plan, which was submitted to the Department as part of the permit application cited by condition (1) of this permit.



Rec'd @ EPA/SER  
10/24/08 22

Attachment 3

RMG Enterprise Inc.  
113 Hillside Avenue  
Londonderry, NH 03053  
Tel: 603-437-6945  
EPA ID: NHD986473460

October 22, 2008

Regional Administrator – Attn: Susan Nachmann  
Environmental Engineer  
US EPA Region 1, New England  
RCRA, EPCRA and Federal Program Unit (SER)  
One Congress Street, Suite 100  
Boston, MA 02114-2023

Mrs. Nachmann,

Good afternoon! Please accept this letter as notification of our intent to export CRTs for reuse.

The CRTs will be exported periodically over the next 12 months. The CRTs will originate from our facility located at 113 Hillside Avenue, Londonderry, NH 03053. Major ocean ports located in Boston and New York/New Jersey will be used for exporting.

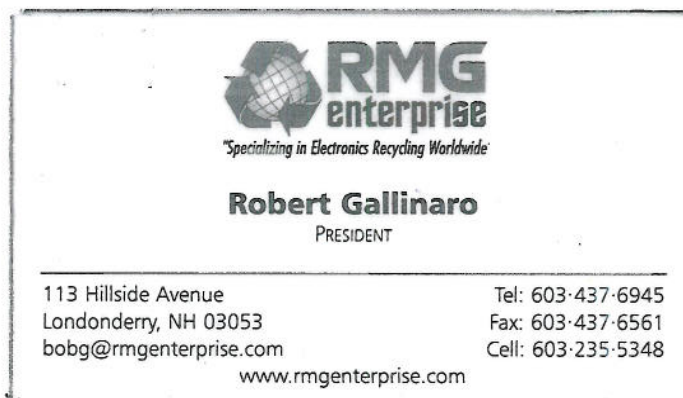
Please do note that RMG Enterprise is an electronics recycling company that specializes in breaking down and recycling CRT Monitors and Televisions and that only a very small percentage of the CRTs that we receive will be sent for reuse. The majority are broken down at our facility in Londonderry, NH and the CRT glass is sent out for recycling. With regard to the CRT glass sent for recycling we do already have the required authorization of consent from EPA.

At present we have clients interested in purchasing CRTs for reuse in Sri Lanka, Vietnam, Malaysia, and Hong Kong. Prior to shipment to any of these clients RMG will verify their qualifications and technical ability to receive and effectively reuse CRTs.

If you have any questions, or if I can be of assistance please contact me at 603-437-6945 ext 23.

With Best Regards,

  
Robert Gallinaro  
President, RMG Enterprise Inc.





DESIGNATED FACILITY TO GENERATOR STATE IF REQUIRED

Attachment 5



Toll Free: 1-866-9-EWASTE

#### Asset Recovery Solutions

E-Waste Recycling  
CRT Processing  
Secure Shredding  
Data Erasure  
Asset Tracking  
Revenue Share  
Packaging & Transportation  
Container Service  
Collection Events  
Drop Off

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**RMG Enterprise** is a one-stop resource for remarketing and compliant recycling of excess or obsolete electronics, IT and PC Related Equipment generated in the Corporate, Municipal, and Residential sectors.

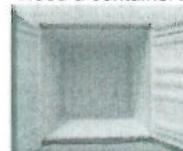
Whether you're a Fortune 500 corporation with a diverse waste stream, a municipality trying to cope with your electronic and CRT disposal, or even a waste hauler looking for an additional downstream route, RMG can help.

Our services, to name just a few, can answer most if not all of your e-waste recycling needs:

- Computer and Electronic Recycling
- CRT (Computer Monitor) Recycling
- Hard Drive Shredding
- Secure Destruction of Sensitive Data
- Onsite Recycling Storage Containers
- On Site Pick Up of your Electronic Waste - Nationwide
- Remarketing of your Re-Usable Assets

Let us be the solution for all of your recycling needs. [Contact us today!](#)  
**1-866-9-EWASTE**

[Need a container?](#)



[Click Here](#)

[Interested in Corporate Buyback?](#)



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## E-Waste Recycling

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RMG Enterprise is a fully permitted commercial solid waste processing facility. As a permitted recycling facility, RMG offers piece of mind that your unusable assets are being handled responsibly and in accordance with all State, Federal, and Local Environmental Laws.

While we firmly believe that "reuse is the best form of recycling" we are also very aware that the potential environmental and economical costs of improper disposal greatly outweigh the marginal gains of "over aggressive" remarketing practices. RMG does not use landfills domestically or abroad.

Upon completion of processing indemnifying documentation, including a certificate of recycling, is provided to certify that all equipment received has been handled properly.



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## CRT Processing

### Asset Recovery Solutions

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With new E-Waste Legislation and CRT landfill bans being passed throughout the United States and Europe federal law makers and the EPA are paying close attention to the handling of Cathode Ray Tubes (CRT's) found in computer monitors and televisions. As HDTV, plasma, and LCD technologies quickly replace the TV and computer monitors of old; E-Waste, and CRT bearing waste in particular, is becoming the fastest growing waste stream in the world.



RMG offers a closed loop solution for the proper recycling of such CRT bearing equipment. RMG's CRT recycling facility is capable of processing up to one million pounds (1,000,000) of CRT bearing equipment per shift per month.



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## Hard Drive & E-Media Shredding

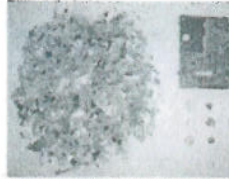
### Asset Recovery Solutions

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At some point, whether you're a large corporation or even a one person company, you're going to need disposing of your computers. And making sure the data on the hard drive is destroyed is crucial.

Physically destroying the hard drive (otherwise known as hard drive shredding) is the best way to make sure no one retrieves your data, but that doesn't mean putting a drill to it or trying to smash the hard drive with a hammer. All that does is just slow someone down in getting personal, secure, or financial information off it. Someone who is determined, or even has some type of hard drive forensics tool, will be able to recover some data – if not most of it.

And if you're in the financial or health sector, you'll need to ensure the data is removed via software, if not physically destroyed, otherwise you could face federal or state violations, such as HIPAA or FACTA.



Let us put your mind at ease. Our shredding service can shred your hard drives, tapes, cd-roms, even documents, leaving in its place a pile of unreadable debris. RMG Enterprise's shredding services eliminates any chance of your secure data being recovered. So call us today at 1-866-9-EWASTE, to handle all your computer and electronic recycling, and know your electronic data is securely removed.



NHD986473460



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DES-SW-SP-03-003

### Security News\*

2006/05 Idaho Power Co.  
- Improper Data Erasure  
- Unknown # of Customers affected

2006/05 State of Georgia  
- Improper Data Erasure  
- Unknown # of Customers affected

2005/06 CitiFinancial  
- Lost Back-Up Tape  
- 3.9 Million Customers affected

2005/02 Bank of America  
- Lost Back-Up Tape  
- 1.2 Million Customers affected

\* Above information courtesy of Privacy Rights Clearing House, [privacyrights.org](http://privacyrights.org)

### Articles & Links

- [Private Data On Discarded Computers](#)
- [HIPAA Standards](#)
- [Facts on FACTA](#)
- [Regarding Sarbanes-Oxley \(SOX\)](#)  
The full text of the Act  
[Rule Spotlights on SOX](#)

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BE ASSURED THAT YOUR DATA IS SECURELY  
DISPOSED OF WITH THE ULTIMATE SOLUTION.



RMG Enterprise is a fully permitted commercial solid waste processing facility specializing in Data Erasure, Hard Drive Shredding, PC, CRT and Server recycling.

- Hard Drives
- Flash Drives
- Floppies
- CD-ROMS
- Optical Disks
- ZIP Disks
- Income Taxes
- Tapes
- Documents

*"Nearly ten million Americans become victims of identity theft each year," Senator Feinstein said.*

*~ U.S. Senator Dianne Feinstein, January 24, 2005*

Let us put your mind at ease. Our shredding service can shred your hard drives, tapes, cd-roms, even documents, leaving in its place a pile of unreadable debris. RMG Enterprise's shredding services eliminates any chance of your secure data being recovered. So call us today to handle all your computer and electronic recycling, and know your electronic data is securely removed.



*"Specializing in Electronics Recycling Worldwide"*

113 Hillside Avenue,  
Londonderry, NH 03053

[www.rmgenderprise.com](http://www.rmgenderprise.com)

**1-866-9-EWASTE**

Please call for a free site visit consultation >>>





# MIT researchers uncover mountains of private data on discarded computers

January 15, 2003

CAMBRIDGE, Mass.--Discarded computers, even those with "erased" disk drives, may harbor confidential information such as credit card numbers and medical records, two MIT graduate students found.

Scavenging through the data inadvertently left on 158 used disk drives, the students at MIT's Laboratory for Computer Science found more than 5,000 credit card numbers, detailed personal and corporate financial records, numerous medical records, gigabytes of personal email and pornography.

The disk drives were purchased for less than \$1,000 from eBay and other sources of used computer hardware. Only 12 were properly sanitized.

"There are many stories in which somebody has bought a used computer and found confidential information on it, but nobody has ever quantified the scale of the problem," said Simson Garfinkel, one of the students. "So we decided to find out."

Results from the study, which Garfinkel performed with Abhi Shelat, are being published in the January/February 2003 issue of *IEEE Security and Privacy*. The research suggests that the secondary market is awash with confidential information, although work needs to be done to get more accurate statistics. More than 150 million disk drives were retired from primary service in 2002.

Of the disk drives acquired, 129 were functional. Of these, Garfinkel and Shelat found 28 disk drives in which little or no attempt had been made to erase any information. One of these drives, Shelat says, had apparently come from an automatic teller machine in Illinois and contained a year's worth of financial transactions.

Attempts to erase information from the drives were usually ineffectual. On many disks, files that would typically be found in the "My Documents" folder had been deleted, but they could be recovered using a simple "undelete" utility. Undelete programs work because deleting a file does not actually overwrite the blocks on the computer's disk that are used to hold the file's information.

Roughly 60 percent of the disks were formatted before they were sold, but even formatting did not properly sanitize a disk because the Windows "format" command doesn't actually overwrite every block--"the format command just reads every block to make sure that they still work," Garfinkel said. "To properly sanitize the hard drive, you need to overwrite every block."

On one of the "formatted" disks, Shelat found more than 5,000 credit card numbers.

Roughly 45 percent of the disks contained no files at all and the disks could not be mounted on the computer. Yet the data could still be retrieved by reading each block of the disk using special tools.







## Federal Trade Commission Protecting America's Consumers

For Release: June 15, 2004

### Provisions of New Fair and Accurate Credit Transactions Act Will Help Reduce Identity Theft and Help Victims Recover: FTC

The Federal Trade Commission today said that provisions of the recently enacted Fair and Accurate Credit Transactions Act will help reduce identity theft and help victims recover. In testimony to the House Ways and Means Committee's Subcommittee on Social Security, Howard Beales, Director of the FTC's Bureau of Consumer Protection, said that many of the provisions will go into effect over the course of this year.

The testimony says one of the newly enacted provisions requires the three major credit reporting agencies to provide consumers with a free copy of their own credit report every 12 months. The requirement will become effective in December but will be phased in over nine months from West to East. The reports allow consumers to discover and correct errors in their credit records and to assure that accounts have not been fraudulently opened in their names.

Another provision that will help prevent identity theft is the National Fraud Alert System. "Consumers who reasonably suspect they have been or may be victimized by identity theft, or who are military personnel on active duty away from home, can place an alert on their credit files. The alert will put potential creditors on notice that they must proceed with caution when granting credit," the testimony says. This provision will take effect December 1, 2004.

A provision of the law will require that account numbers on credit card receipts be shortened or "truncated" so that merchants, employees, or others who may have access to the receipts do not have access to consumers' names and full credit card numbers.

The testimony reports that the FTC is working with banking regulators to identify "red flag" indicators to help financial institutions and creditors analyze identity theft patterns so that they can take action to prevent further incidences of identity theft. The agencies also are working together to develop a rule that will require appropriate disposal of sensitive credit report information. "This requirement will help to ensure that sensitive consumer information, including Social Security numbers, is not simply left in a trash dumpster, for instance, once a business no longer needs the information," the testimony says.

Measures that will help consumers recover their credit reputations after they have been victims of identity theft include:

- A provision that will require credit reporting agencies to stop reporting allegedly fraudulent account information when a consumer establishes that he or she has been the victim of identity theft;
- A provision that requires creditors or businesses to provide copies of business records of fraudulent accounts or transactions related to them. "This information can assist victims in proving that they are, in fact, victims. For example, they may be better able to prove that the signature on the application is not their signature;" and,
- A provision that will allow consumers to report accounts affected by identity theft directly to creditors - in addition to credit reporting agencies - to prevent the spread of erroneous credit information.

"When fully implemented, these provisions should help to reduce the incidence of identity theft, and help victims recover when the problem does occur," the testimony says.

**The Commission vote to issue the testimony was 5-0.**

Copies of the testimony are available from the FTC's Web site at <http://www.ftc.gov> and also from the FTC's Consumer Response Center, Room 130, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580. The FTC works for the consumer to prevent fraudulent, deceptive, and unfair business practices in the marketplace and to provide information to help consumers spot, stop, and avoid them. To file a complaint in English or Spanish (bilingual counselors are available to take complaints), or to get free information on any of 150 consumer topics, call toll-free, 1-877-FTC-HELP (1-877-382-4357), or use the complaint form at <http://www.ftc.gov>. The FTC enters Internet, telemarketing, identity theft, and other fraud-related complaints into



Consumer Sentinel, a secure, online database available to hundreds of civil and criminal law enforcement agencies in the U.S. and abroad.

**Media Contact:**

Claudia Bourne Farrell  
Office of Public Affairs  
202-326-2181

**Staff Contact:**

Naomi B. Lefkowitz  
Bureau of Consumer Protection  
202-326-3058

---

E-mail this News Release

If you send this link to someone else, the FTC will not collect any personal information about you or the recipient.

**Related Documents:**

**Prepared Statement of the Federal Trade Commission On Identity Theft and Social Security Numbers, Presented by J. Howard Beales, III, Director, Bureau of Consumer Protection, Before the Subcommittee On Social Security of the Committee On Ways and Means, United States House of Representatives (June 15, 2004)**

- Text of the Commission Testimony

**Consumer Information:**

- ID Theft

Last Modified: Friday, June 24, 2011



Toll Free: 1-866-9-EWASTE

## Data Erasure

### Asset Recovery Solutions

- E-Waste Recycling
- CRT Processing
- Secure Shredding
- Data Erasure
- Asset Tracking
- Revenue Share
- Packaging & Transportation
- Container Service
- Collection Events
- Drop Off

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The security of proprietary data is a major concern for most companies and a responsibility that we at RMG take very seriously.

RMG's non-destructive data erasure process incorporates overwriting of hard disk drives to meet or exceed the DoD standard (5220.22-M), removal of client asset tags and identifying marks, and a thorough physical inspection of all equipment for any other forms of proprietary data/information such as data which might be found on abandon floppy disks and CD Roms, or printed documents hidden in copiers, printers, and faxes.

Upon completion of processing, verification of data erasure is sent via email. The verification includes detailed information on each hard drive processed including make, model, serial number, capacity, and the date, time, and standard to which each drive was overwritten.



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Toll Free: 1-866-9-EWASTE

## Asset Tracking

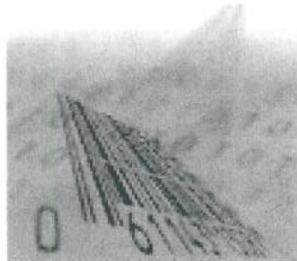
### Asset Recovery Solutions

- E-Waste Recycling
- CRT Processing
- Secure Shredding
- Data Erasure
- Asset Tracking
- Revenue Share
- Packaging & Transportation
- Container Service
- Collection Events
- Drop Off

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**Serialized Inventory** - Upon receipt at our facility all equipment is assigned a unique lot identification number that is specific to each client and the date received. The equipment is then scanned into our proprietary database and tracked throughout the process by serial number and lot identification number.

**Equipment Audit** - Each piece of equipment is inspected and graded in order to determine whether it will be tested, refurbished, and re-sold, or disassembled and recycled.

**Custom Reports** - A wide variety of customized processing and inventory reporting options are available based on each client's individual requirements.



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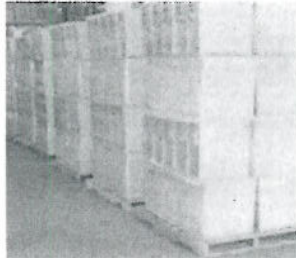


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Revenue Share

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**Maximum Returns** - RMG has developed and maintains an unparalleled global network to effectively remarket all of your re-useable assets. In addition to online auctions and an extensive local customer base, RMG utilizes strategic partnerships with distributors, wholesalers, and retailers throughout the world, which enables us to offer the highest possible prices for your equipment.

**Component Sales** - Equipment that is not suitable for resale is disassembled to harvest potentially sellable components. Once disassembled, the residual equipment can be properly recycled, and the extracted components used to add value and offset processing costs through component sales and/or metal reclamation.

Do you have equipment to sell? One of our highly experienced field service agents will be happy to evaluate your assets and provide an up front assessment of the inventory and a written lot offer or proposal. RMG's open pricing approach enables our clients to accurately forecast the revenues that will be generated through the sale of their retired assets.



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## Packaging & Transportation

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**On Site Pick Up** - RMG is equipped with a fleet of trucks and all of the material handling equipment needed to get the job done right. Our courteous logistics professionals will personally package, palletize, and wrap your equipment on site and safely transport it to our facility for processing. We can remove all types of IT equipment whether it's several pieces or several thousand.

**Nationwide Coverage** - RMG's logistics team can manage your entire project nationwide through a comprehensive network of professional and fully insured movers, trucking companies, and freight brokers.

**Personal Attention** - Prior to pick up we take the time to understand ALL the logistics criteria. RMG will gladly arrange for a pre-pickup site visit and consultation at no charge to ensure that your project is a success. We can also arrange for moves after business hours, insurance certificates, and buildings with special labor requirements.



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## Container Service

RMG offers a wide variety of containers to suit every need.

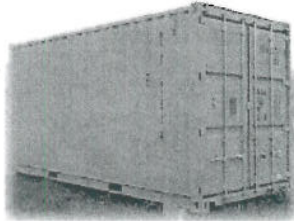
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**Portable 12', 16, or 20', Ground level containers** - RMG's portable E-Waste containers can be "hand loaded". No pallets or tri-wall boxes required. All portable containers are freshly painted, clean, secure and feature a translucent roof and roll-up door. Simply load it, call, and we'll come take it away and leave an empty in its place.

**Stationary 20', 40', 48' storage containers and trailers** - Both ground level and dock height storage units are available for rent or for sale.

**Road Trailers 48' or 53' dock height** - All road trailers are delivered fully stocked with replacement pallets and/or boxes. Each trailer holds between 20,000 to 30,000 pounds of E-Waste making pick-ups less frequent and more cost effective.



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## Collection Events

## Asset Recovery Solutions

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Collection events are an excellent way to promote recycling in your community, with little or **no cost** to the town/city. Coordinate with the local household hazardous waste collection day, or schedule an event exclusively for E-Waste. RMG can supply the trucks, equipment, labor, and support services to make your event a success.

Contact one of our specialists today to help organize your next collection event, and don't forget to ask about our "**no cost**" program.

In preparation for your community's special collection we would welcome you to attend an E-Waste event at our facility in Londonderry, NH. Please see the side bar for our schedule of collection events being offered by RMG.

## Events Calendar

Fri, Sep 2 9:00 AM - 3:00 PM	Londonderry, NH: E-Waste Collection
Fri, Sep 9 9:00 AM - 3:00 PM	Londonderry, NH: E-Waste Collection
Fri, Sep 16 9:00 AM - 3:00 PM	Londonderry, NH: E-Waste Collection
Fri, Sep 23 9:00 AM - 3:00 PM	Londonderry, NH: E-Waste Collection
Fri, Sep 30 9:00 AM - 3:00 PM	Londonderry, NH: E-Waste Collection

[Click here to see  
next month's events.](#)



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## Drop Off

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RMG Enterprise gladly accepts drop offs at our Londonderry, NH facility located at 113 Hillside Avenue in Londonderry, NH. For a schedule of collection events being offered by RMG Enterprise, please [click here](#).

### 2009 Residential Recycling Rates:

Computer Monitors	- \$10 each
Plastic Case Televisions	- \$15 each
Wooden Console or Rear Projection Television	- \$20 each
Other Electronics (Non-CRT bearing)	- \$5 each

We welcome all businesses to [contact us by email](#), via our [online form](#), or by phone, to discuss our **corporate rates** and a dock appointment or visit the asset recovery solutions section of our website for additional services.

**Directions:** From Route 93 take Exit 4 (Route 102) towards Derry. Turn left onto Londonderry Road, and then take first right onto Hillside Avenue. We are located in the first building on your left, at 113 Hillside Avenue. It is a beige colored building with steel exterior. RMG occupies the front, right, portion of the building (unit G).



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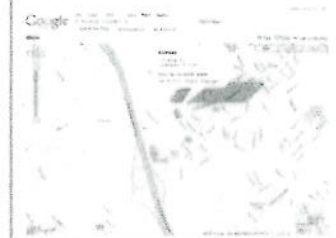


RMG Enterprise Incorporated  
 113 Hillside Avenue  
 Londonderry, NH 03053

Main: 603-434-9414  
 Fax: 603-437-6561  
 Toll Free: 866-9-EWASTE (392783)

Email: [info@rmgenterprise.com](mailto:info@rmgenterprise.com)Web: <http://www.rmgenterprise.com>

Click here for a bird's eye view  
 of where we are located.

**Driving Directions:**

From Route 93 take Exit 4 (Route 102) towards Derry. Turn left onto Londonderry Road, and then take first right onto Hillside Avenue. We are located in the first building on your left, at 113 Hillside Avenue. It is a beige colored building with steel exterior. RMG occupies the front, right, portion of the building (unit G).

First Name \*

Last Name \*

Company Name

Address

City

State

Zip Code

Telephone \*

Email Address \*

Please indicate areas of interest? (Please check all that apply.)

☐ Asset Tracking☐ Data Erasure☐ Equipment Re-Sale☐ CRT Processing☐ Document Shredding☐ Containment Services☐ E-Waste Recycling☐ E-Media Shredding☐ Collection Event Planning☐ Hard Drive Shredding

Do you require on site pick-up?

☐ Yes☐ No

Is equipment dock-ready or loose?

Please Select One 

Is there a loading dock available?

☐ Yes☐ No

Approximately, how many devices do you have?

Please Select One ▾

Do you require one (1) time or ongoing service?

- ☐ One (1) Time Service  
☐ Ongoing Service

How did you find us? (Please check all that apply.)

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Referral      | <input type="checkbox"/> Yellow Pages (Phonebook) | <input type="checkbox"/> Search Engine |
| <input type="checkbox"/> Business Card | <input type="checkbox"/> Yellow Pages (Online)    | <input type="checkbox"/> Other         |



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